

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No. 23-CR-354-SEH**

**RONALD DALE SANDERS,**

**Defendant.**

**Unopposed Motion for Downward Variance**

The government requests the Court to impose a downward variance from the applicable guideline offense level. The government requests the Court vary downward one additional level to a Total Offense Level of 42, which would result in a sentencing range of 360 months to life. The government requests that the variance be granted and that the Court sentence Sanders to 420 months imprisonment. In support of this motion, the government states the following:

**Relevant Facts**

The government incorporates by reference the relevant facts from its Sentencing Memorandum.

**Basis for Variance**

Title 18, United States Code, Section 3553(a) sets forth the factors a court is to

consider when imposing a sentence. In part, this statute mandates consideration of the “the nature and circumstances of the offense and history and characteristics of the defendant” and that the Court impose a sentence that will “afford adequate deterrence to criminal conduct” and “protect the public from further crimes of the defendant.”

**A. Nature and Circumstances of Sanders’ offense, his history and characteristics, and the need to deter his conduct and protect the public is accomplished by a term of imprisonment of 420 months.**

As mentioned in the Government’s sentencing memorandum, Sanders’ abuse of MV warrants a significant sentence even when considering his early acceptance of responsibility. This is accomplished with a term of imprisonment of 420 months. In the PSR, Sanders brings up substance abuse problems, a traumatic brain injury, blood pressure issues, and depression as reoccurring problems around the time he abused MV. PSR ¶ 63-68. It is important to note that even if these were issues that Sanders was dealing with during that time, it does not excuse his behavior and abuse of MV. Sanders’ intentionally and purposefully sought out a prior 14-year-old student and made the conscious decision to pursue a romantic and sexual relationship with her. Sanders took advantage of her vulnerable state and used that to manipulate her into having sex with him. Plenty of people deal with similar problems as Sanders and they do not go out and sexually abuse and take advantage of minor children. Sanders also abused MV while he taught other similarly aged children. While the Government agrees a variance from life imprisonment is warranted in this case due to Sanders early acceptance of responsibility, a lengthy

term of imprisonment is necessary to hold Sanders accountable for the abuse MV suffered. MV will have to live the rest of her life with the impact of what Sanders did to her. A term of imprisonment of 420 months takes this into account and is a just punishment.

### **Conclusion**

Based on the nature and circumstances of Sanders's crime, his history and characteristics, the government is requesting this Court vary down one additional level and sentence Sanders to a term of imprisonment of 420 months.

Respectfully submitted,

CLINTON J. JOHNSON  
UNITED STATES ATTORNEY

BY: /s/ Alicia Hockenbury  
Alicia Hockenbury, OBA No. 34108  
Assistant United States Attorney  
110 West 7<sup>th</sup> Street, Suite 300  
Tulsa, Oklahoma 74119  
(918) 382-2700

### **Certificate of Service**

I hereby certify that on the 2nd day of July, 2025, I electronically submitted the foregoing document to the Clerk of Court using the ECF System for filing under seal and emailed a copy to the following ECF registrant:

John Connelly  
*Counsel for Defendant*

/s/ Alicia Hockenbury

Alicia Hockenbury  
Assistant United States Attorney